### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2015-53-E

IN RE:	Application of Duke Energy Progress,	)	
	Incorporated to Establish a Distributed	)	JOINT PETITION
	Energy Resource Program	)	TO
	2,	)	INTERVENE

### **INTRODUCTION**

A Commission Docket was opened in this matter on February 9, 2015, and assigned the above-referenced Docket number. Joint Petitioners herein, are (i) Solbridge Energy LLC and (ii) Sustainable Energy Solutions, LLC. This <u>Joint Petition to Intervene</u> filed pursuant to R. 103-825, of this Commission's Rules and Regulations, follows:

## **JOINT PETITIONERS**

### Solbridge Energy LLC.

- 1. Solbridge Energy LLC (hereinafter, "Solbridge Energy"), is a Delaware Corporation, domesticated to conduct business in the State of South Carolina, with its principal place of business in Daniel Island, South Carolina.
- 2. Solbridge Energy is a Solar Development Company. Their business model is to (i) identify financially viable opportunities to build solar power plants (ii) package each solar power plant as a distinct project and investment opportunity, and (iii) manage the installation and ongoing operations of each project. Solbridge Energy focuses on projects ranging in size between one to twenty megawatts, located primarily along the Eastern Seaboard. Solbridge Energy, along with its development partner, controls a portfolio of approximately 100 MW.

# Sustainable Energy Solutions, LLC.

- 3. Sustainable Energy Solutions, LLC (hereinafter, "Sustainable Energy"), is a Limited Liability Corporation, organized under the Laws of the State of South Carolina with its principal place of business in Charleston, South Carolina.
- 4. Sustainable Energy is a renewable energy solutions provider, with a focus on solar thermal and photovoltaic energy systems. Their services include planning, consulting, design, system installation and maintenance and project development.
- 5. As a developer, Sustainable Energy controls a pipeline of 150 MW of utility scale projects focused mainly in the Southeastern States, including Maryland, North Carolina, South Carolina and Arkansas. Sustainable Energy's projects range in size from 1 to 50 MW.

## Joint Intervenors.

- 6. Although Solbridge Energy and Sustainable Energy are separate legal entities, they share: common business interest, financing sources and are joint development partners.
- 7. Because of their closely interrelated interests in this Docket, Solbridge Energy and Sustainable Energy are filing this, "Joint Petition to Intervene".
- 8. Duke Energy Progress, Incorporated (hereinafter as, "DEP"), has filed an Application with this Commission to implement a Distributed Energy Resource Program to accomplish and further the purposes and goals of the South Carolina Distributed Energy Resource Program Act. The Application was filed pursuant to Section 58-39-130 S.C. Code Ann., (1976, as amended).
- 9. On August 20, 2014, Joint Petitioners were granted leave to Intervene in the Genesis Docket related to the Act, Docket 2014-246-E, and Joint Interveners participated in the Hearing held in that Docket.
- 10. Joint Petitioners conduct businesses in DEP's territory, including sales to DEP Consumers. Joint Petitioners participated in the discussions leading up to the Act. Joint Petitioners further participated in discussions at the Office of Regulatory Staff and were signatories to the Settlement Agreement filed on December 11, 2014, in Docket 2014-246-E.

- 11. Joint Petitioners' position is that they are, "interested parties", as contemplated in the Act, who have a direct and material interest in the issues to be heard and addressed in this Docket, whose interest cannot be adequately represented by any other Party and Joint Petitioners should be allowed to Intervene and fully participate in this Docket.
- 12. Joint Petitioners' intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before the Commission, and [Intervention] should be allowed so that a full and complete record... can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).
- 13. Joint Petitioners should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in the Hearing to be scheduled in this matter.

# **JOINT PETITION TO INTERVENE**

- 14. The granting of the Commission Solbridge Energy LLC's Petition to Intervene and Sustainable Energy Solutions, LLC's Petition to Intervene, filed jointly, is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.
- 15. Solbridge Energy LLC and Sustainable Energy Solutions, LLC are represented by counsel in this proceeding:

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# WHEREFORE, Joint Petitioners pray for the following relief:

- (a) That this Joint Petition to Intervene be accepted and that Joint Petitioners be made parties of record;
- (b) That Joint Petitioners be allowed to participate fully in this proceeding and take such positions as they deem advisable; and
  - (c) For such other and further relief as is just and proper.

Respectfully Submitted,

/S/

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April 14, 2015 Columbia, South Carolina